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6 *Attorneys for Plaintiff*
7 THAT ONE VIDEO ENTERTAINMENT, LLC, a
California limited liability company

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9 **UNITED STATES DISTRICT COURT**
10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

11 THAT ONE VIDEO
12 ENTERTAINMENT, LLC, a
California limited liability company,
13 Plaintiff,
vs.
14 KOIL CONTENT CREATION PTY
LTD., an Australian proprietary
limited company doing business as
NOPIXEL; MITCHELL CLOUT, an
individual; and DOES 1-25, inclusive,
15 Defendants.

CASE NO: 2:23-cv-02687 CAS (JCx)

[Assigned to the Hon. Stephen V. Wilson;
Ctrm 10A]

JOINT STATUS REPORT

[*Declaration of Benjamin Lau filed
concurrently herewith*]

Hearing

Judge: Hon. Jacqueline Chooljian
Date: September 24, 2024
Time: 9:30 a.m.
Place: Ctrm 750, 255 East Temple Street,
Los Angeles, CA 90012

Action Filed: April 10, 2023
Trial Date: September 17, 2024

1 Counsel for Plaintiff THAT ONE VIDEO ENTERTAINMENT, LLC, a
2 California limited liability company (“Plaintiff”) and Defendants KOIL CONTENT
3 CREATION PTY LTD., an Australian proprietary limited company doing business
4 as NOPIXEL (“NoPixel”) and MITCHELL CLOUT, an individual (“Clout”)
5 (collectively, “Defendants”), have met and conferred and hereby submit this status
6 report in response to the Order issued on August 30, 2024. (Dkt. 59).

7 The Order indicates that the parties do not address whether federal or state
8 privilege law applies. The Order further states that “federal jurisdiction in this case is
9 predicated solely on the Declaratory Judgment Act, 28 U.S.C. § 2201, with
10 supplemental jurisdiction afforded to the other claims under 28 U.S.C. § 1337.” (Dkt.
11 59). The parties hereby stipulate and agree with this Court’s assessment as to how
12 federal and supplemental jurisdiction applies.

13 Furthermore, the Order indicated that the parties should discuss whether the
14 issue as to communications with immigration counsel can be resolved via a brief
15 declaration. The parties have agreed that a declaration from Plaintiff’s immigration
16 counsel, Benjamin Lau, Esq would obviate the need for the production of documents.
17 Plaintiff will obtain a declaration from Mr. Lau no later than September 13, 2024,
18 and the parties will update the court by September 16, 2024 as to whether the relevant
19 Motion must still be heard.

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21 DATED: September 10, 2024

ALTVIEW LAW GROUP, LLP

22 By:
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JOHN M. BEGAKIS
SHEENA B. TEHRANI
*Attorneys for Plaintiff THAT ONE VIDEO
ENTERTAINMENT, LLC, a California
limited liability company*

DATED: September 10, 2024

MORRISON COOPER LLP

By: /s/ Larry Zerner

LARRY ZERNER

Attorneys for Defendants KOIL
CONTENT CREATION PTY LTD., an
Australian proprietary limited company
doing business as NOPIXEL, and
MITCHELL CLOUT, an individual

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing electronically filed document has been served via a "Notice of Electronic Filing" automatically generated by the CM/ECF System and sent by e-mail to all attorneys in the case who are registered as CM/ECF users and have consented to electronic service pursuant to L.R. 5-3.3.

Dated: September 10, 2024

By: /s/ John Begakis

John M. Begakis

CERTIFICATE OF SERVICE